

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

)  
**IN RE: NATIONAL PRESCRIPTION** )  
**OPIATE LITIGATION** )  
)  
This document relates to: )  
*The County of Summit, Ohio, et al. v. Purdue* )  
    *Pharma L.P., et al.* )                          MDL No. 2804  
    Case No. 18-op-45090 )  
                                )                          Hon. Judge Dan A. Polster  
                                and )  
                                )  
*The County of Cuyahoga v. Purdue Pharma* )  
    *L.P., et al.* )  
    Case No. 1:18-op-45004 )  
                                )  
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)

**DECLARATION OF CHRISTIAN J. PISTILLI  
IN SUPPORT OF DEFENDANTS' OPPOSITION TO  
TRACK ONE PLAINTIFFS' MOTION FOR PARTIAL SUMMARY ADJUDICATION  
OF DEFENDANTS' DUTIES UNDER THE CONTROLLED SUBSTANCES ACT**

I, Christian J. Pistilli, declare as follows:

1. I am a partner at the law firm of Covington & Burling LLP and counsel to Defendant McKesson Corporation in this action.
2. I make this declaration to place before the Court certain materials relied on in Defendants' Opposition to Track One Plaintiffs' Motion for Partial Summary Adjudication of Defendants' Duties under the Controlled Substances Act.
3. Attached as **Exhibit 1** is a true and correct the deposition testimony of Michael Mapes, dated July 11 and 12, 2019.

4. Attached as **Exhibit 2** is a true and correct copy of letters between Chris Zimmerman and DEA, dated September 30, 1996; October 29, 1996; October 3, 1997; December 30, 1997; March 20, 1998; and July 23, 1998, and which were produced in discovery and marked with Bates numbers ABDCMDL00315783 through ABDCMDL00315794.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of July, 2019, in Washington, D.C.



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CHRISTIAN J. PISTILLI